

EXHIBIT 43

Honorable Judge Tiffany M. Cartwright

IN THE U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOANN LEDOUX, a single woman.

Plaintiff,

vs.

OUTLIERS, INC. (d/b/a THESIS, THESIS
NOOTRIPICS, FIND MY FORMULA, and
FORMULA), a Delaware Corporation;
DANIEL FREED, individually; MATT
RUBIN, individually; BRAND
NUTRACEUTICALS, INC. (d/b/a BRAND
NUTRA), a New York Corporation; BRAND
PACKAGING GROUP, INC. (d/b/a BRAND
NUTRACEUTICALS), a New York
Corporation; and John and Jane Does 1-5.

Defendants.

No. 3:24-cv-05808-TMC

**NOTICE OF VIDEO-RECORDED
DEPOSITION OF SAMEER ANAND**

TO: SAMEER ANAND
7 W. 21st Street, Apt. 4A
New York, NY 10010

AND TO: Attorneys For Defendants

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that pursuant to Federal
Rule of Civil Procedure 30, the deposition testimony upon oral examination of the following
described person will be taken before a certified court reporter and videographer at the
following time, date, and place:

NOTICE OF VIDEO-RECORDED DEPOSITION
OF SAMEER ANAND - 1
No. 3:24-cv-05808-TMC

Law Office of Jocelyn C Stewart, Corp.
1201 Pacific Avenue, Ste 600
Tacoma, WA 98407
Phone: (253) 317-8494

1 **Witness:** Sameer Anand

2 **Date:** July 14, 2025 (Monday)

3 **Time:** 9:00 a.m. Eastern Standard Time

4 **Location:** Baritz Colman Richan & Harris LLP
5 233 Broadway, Ste 2020
6 New York, NY 10279

7 This testimony upon oral examination will be taken on the ground and for the reason the
8 said person is a party to or a witness in the above-entitled action and will give evidence material
9 to the establishment of the plaintiff's case.

10 Prior to the deposition, Sameer Anand is commanded to produce the documents
11 requested in the accompanying Subpoena, and to otherwise respond on the record by stating
12 what, if any documents, data or information exists and whether such documents / data are being
13 produced or withheld and the legal basis for any objection. All such responses and the actual
14 production and furnishing of documents / data **shall be due on or before July 14, 2025** at 9:00
15 a.m. EST.

16 This deposition shall be subject to continuance or adjournment from time to time or
17 place to place until completed, and to be taken on the grounds and for the reason the said
18 witness will give trial testimony and any and all other purposes permitted under the Court
19 Rules.

20 DATED this 10th day of June, 2025.

21 ATTORNEYS FOR PLAINTIFFS

22 _____
23 */s/ Jocelyn C. Stewart*

24 **Jocelyn C. Stewart** WSBA No. 58100
25 **Law Office of Jocelyn C Stewart, Corp.**
 1200 Pacific Ave. # 600

NOTICE OF VIDEO-RECORDED DEPOSITION
OF SAMEER ANAND - 2
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5 /s/ Talis M. Abolins

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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused true and correct copies of the foregoing document to be served upon the following, at the addresses stated below, via electronic transmission.

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*Attorneys for Non-Parties Sameer Anand and
Maranda Lujajohnson*

20 DATED this 10th day of June, 2025.

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Jen L. Bassetti, Litigation Paralegal